



National Republican Congressional Committee

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Donald F. McGahn II  
General Counsel

MUR 5053

July 19, 2000

Lawrence M. Noble, Esq.  
General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

JUL 20 2 47 PM '00

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

Re: Complaint Against Cal Dooley and Dooley for Congress

Dear Mr. Noble:

The National Republican Congressional Committee, by and through its General Counsel, hereby brings this complaint pursuant to 2 U.S.C. § 437g(a)(1) against Cal Dooley and Dooley for Congress. The National Republican Congressional Committee is located at 320 First Street, S.E., Washington, D.C. 20003.

#### I. VIOLATIONS

Cal Dooley is the fifth-term Representative from the twentieth district of California, and is seeking re-election this November. Dooley for Congress is his principal campaign committee.

320 First Street, S.E.  
Washington, D.C. 20003  
(202)479-7069  
[www.nrcc.org](http://www.nrcc.org)

### **A. Acceptance of Prohibited Corporate Funds**

Dooley's recently filed FEC report reveals that he accepted \$10,000 from an entity called "HCC Properties, Ltd." Under California law, "Limited" (commonly abbreviated "Ltd.") denotes a corporation. See California Corporate Code § 202(a). Moreover, local news reports indicate that HCC Properties Ltd. "is Hilmar Cheese Company." *The Fresno Bee* (7/19/00) (attached). The full name of Hilmar is Hilmar Cheese Company, Inc., and is filed as a corporation with the California Secretary of State. Thus, Dooley accepted \$10,000 in prohibited corporate funds.

When confronted with this illegality, Dooley claimed that any such charge is "false." The next day, however, Dooley's story changed – he now calls it an "oversight." *The Fresno Bee* (7/19/00). Such doubletalk, coupled with the clear indication that the source of the funds was corporate, indicates that the violation is knowing and willful.

### **B. Even If the Funds Were From a Partnership or Other Non-Corporate Entity, Dooley Still Broke the Law**

Commission regulations state that "[a] contribution from a partnership shall not exceed the limitations on contributions in 11 C.F.R. § 110.1(b), (c), and (d)." 11 C.F.R. § 110.1(b) limits such contributions to \$1,000 per election. Thus, even if made from a partnership, the \$10,000 contribution is still unlawful, and a violation of these provisions.

## **II. CONCLUSION**

Cal Dooley has violated the law by accepting corporate money. Perhaps most shocking about this revelation is that just over a week ago, Dooley attempted to take his challenger to task regarding "tainted money," while at the same time taking credit for campaign finance-related legislation passed by the Republican-controlled Congress. Perhaps Dooley ought to read his own words, and live by them:

In the spirit of this new bipartisan commitment to reform, I would urge you to disassociate yourself from this tactic, and play straight with the people of the 20<sup>th</sup> district. This is money you can choose to accept or reject. As an acknowledgment of the importance of our campaign finance laws, I urge you to reject it.

For the foregoing reasons, the National Republican Congressional Committee respectfully requests that the Commission find there is a reason to believe that a violation has occurred, and promptly investigate the matter. The NRCC also asks that the Commission institute civil proceedings in an appropriate Federal court, and secure an appropriate civil fine for this knowing and willful violation.

21-04-405-0127

The foregoing is correct and accurate to the best of my knowledge, information and belief.

Respectfully submitted,



Donald F. McGahn II

District of Columbia

Signed and sworn to before me this

19 day of July, 2000.



Notary Public

My Commission expires: \_\_\_\_\_

**M.D. ACTON**  
Notary Public, District of Columbia  
My Commission Expires July 14, 2004

3210 504 40 12

**SCHEDULE A**

**ITEMIZED RECEIPTS**

See separate schedule  
for each category of the  
Detailed Summary Page

2000

PAGE

JUL 20 6 11:10

OF

FOR LINE NUMBER  
11(a) (i)

Any information copied from such reports and statements may not be sold or used by any person for the purpose of soliciting contributions or for editorial purposes, other than using the name and address of any political committee to solicit contributions from such contributor.

**NAME OF COMMITTEE (In Full)**

**Dooley for Congress Committee**

<b>A. Full Name, Mailing Address and Zip Code</b> Wayne R. Gomes 300 Lakeside Drive Oakland, CA 94610- Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Name of Employer</b> Information Requested Occupation Aggregate Year-to-Date -> \$250.00	<b>Date (month, day, year)</b> 06-29-2000	<b>Amount of Each Receipt this Period</b> \$250.00
<b>B. Full Name, Mailing Address and Zip Code</b> Thomas R. Green 1500 Marshall Lane Austin, TX 78701- Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Name of Employer</b> Sr VP Law and Administration Occupation Dell Computer Corporation Aggregate Year-to-Date -> \$500.00	<b>Date (month, day, year)</b> 06-27-2000	<b>Amount of Each Receipt this Period</b> \$500.00
<b>C. Full Name, Mailing Address and Zip Code</b> HCC Properties, Ltd. Post Office Box 910 Kilmar, CA 95324- Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Name of Employer</b> Partnership Attribution Listed Individually Occupation Partnership Aggregate Year-to-Date -> \$10500.00	<b>Date (month, day, year)</b> 05-19-2000	<b>Amount of Each Receipt this Period</b> \$10000.00
<b>D. Full Name, Mailing Address and Zip Code</b> Mary Kay K. Haken 1525 Long Valley Road Glenview, IL 60025- Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Name of Employer</b> Kraft Foods Occupation President Kraft Cheese Division Aggregate Year-to-Date -> \$1000.00	<b>Date (month, day, year)</b> 06-06-2000	<b>Amount of Each Receipt this Period</b> \$1000.00
<b>E. Full Name, Mailing Address and Zip Code</b> Harvey Hall 2001 O Street Sakersfield, CA 93301- Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Name of Employer</b> Hall Ambulance Service Occupation President & CEO Aggregate Year-to-Date -> \$300.00	<b>Date (month, day, year)</b> 06-06-2000	<b>Amount of Each Receipt this Period</b> \$300.00
<b>F. Full Name, Mailing Address and Zip Code</b> Nakiyi Hase 16461 Grangeville Boulevard Lemoore, CA 93245- Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Name of Employer</b> Self Employed Occupation Farmer Aggregate Year-to-Date -> \$1000.00	<b>Date (month, day, year)</b> 05-19-2000	<b>Amount of Each Receipt this Period</b> \$1000.00
<b>G. Full Name, Mailing Address and Zip Code</b> Ruth Hase 16461 Grangeville Boulevard Lemoore, CA 93245- Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Name of Employer</b> Self Employed Occupation Farmer Aggregate Year-to-Date -> \$500.00	<b>Date (month, day, year)</b> 05-19-2000	<b>Amount of Each Receipt this Period</b> \$500.00

**SUBTOTAL** of Receipts This Page (optional)

\$13550.00

**TOTAL** This Period (last page this line number only)

ELECTION 2000

# Dooley, Rodriguez dueling for dollars

The incumbent congressman says he is 'prepared to have to raise \$1 million.'

BY JOHN ELLIS  
THE FRESNO BEE

The battle for the 20th Congressional District seat — held since 1990 by Cal Dooley, a Hanford Democrat — is starting to look like one of the most expensive in the district's history.

Already, Rich Rodriguez, Dooley's Republican opponent, is on a clip to raise more money than any other Dooley challenger.

For the reporting period that ended July 15, Rodriguez reported \$230,000 cash on hand. During the past six months, he has raised \$321,000. By comparison, Trice Harvey — Dooley's formidable 1996 opponent — raised a total of \$505,054.

"Unbelievable," said Joe Galli, Rodriguez's campaign manager. "Who would have thought it? In six months." Rodriguez was not available to comment.

Despite his eye-popping amount — and the fund-raising success it suggests — Rodriguez is still far behind Dooley in the fund-raising sweepstakes.

Dooley, proving himself an effective fund-raiser, reported \$659,851 cash on hand. "I'm prepared to have to raise \$1 million," Dooley said. "I will raise it, and I am well on my way to doing it."

Already, he has raised more money than in his past re-election efforts.

What it all means is the congressional race could be one of the most interesting in the nation as the Democrats battle to retake control of the House. Already, several high-profile members of Congress have come to the Valley to stump for Rodriguez. Dooley, who has downplayed the challenge, is nevertheless raising money at an aggressive clip.

And as the fund-raising has heated up, so has the acrimony.

Galli continued his claim that most of Dooley's money — 89% — is coming from outside the Valley. "That speaks volumes to the district, to where the support is in this campaign."

Dooley countered by pointing out that, while the organizations may not be locally based, they represent local interests. He also made public a long list of local donors — a list that included several prominent developers — a list that included several prominent developers. Please see MONEY, Page B3



Cal Dooley



Rich Rodriguez

## Money: Rodriguez camp points out error in Dooley's statement

Continued from Page B1  
operators, farmers and business owners, including Richard Gunner, Ed Kashian, Edward Donaghy and John Harris.

In disputing the 89% figure, Dooley cited Sunkist, based in Sherman Oaks, the National Cotton Council, based in Washington D.C., and Kraft Foods, the No. 1 employer in the district, as organizations outside the district, but that have significant interests within it. All have supported Dooley.

And, Dooley claimed, Rodriguez solicited donations from, and was rejected, by these same organizations, and is relying on the Republican political power base in Washington for support.

"That's ridiculous," Galli said. "Rich has the support of a lot of

individual donors in this community."

Rodriguez's camp also found an error in Dooley's campaign statement — a \$10,000 donation from HCC Properties Ltd., which is Hilmar Cheese Co. A partnership is limited to a \$1,000 donation. But the HCC donation is from multiple partners at the company, Dooley said. In that case, a list of the donors and the amount they contributed is required by law.

Galli called it "an egregious error by a career politician who should know better," but Dooley said it was an oversight and an amended report would be filed. "We will ensure that information is provided," he said. "Clearly, it was an oversight. There is a difference between oversight and something clearly illegal."

The  
Fresno  
Bee

7/19/00

**Corporations**

BUSINESS PROGRAMS

[Contact Us](#)[Home](#)**Bill Jones**

**Disclaimer:** The information displayed here is current as of "Jul 15, 2000" and is updated weekly. It is not a complete or certified record of the Corporation.

Corporation		
HILMAR CHEESE COMPANY, INC.		
<b>Number:</b> C1245565	<b>Date Filed:</b> 4/30/1984	<b>Status:</b> active
<b>Jurisdiction:</b> California		
Mailing Address		
PO BOX 910		
HILMAR, CA 95324		
Agent for Service of Process		
JOHN JETER		
9001 N LANDER AVE		
HILMAR, CA 95324		

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- Blank fields indicate the information is not contained in the computer file.
- If the status of the corporation is "Surrender", the agent for service of process is automatically revoked. Please refer to [California Corporations Code Section 2114](#) for information relating to service upon corporations that have surrendered.

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